

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1) GEORGE COLLINS and	)	
(2) ALRIKA COLLINS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 22-cv-00318-RAW-JAR
	)	
(1) STATE FARM FIRE AND	)	
CASUALTY COMPANY,	)	
	)	JURY TRIAL DEMANDED
Defendant.	)	
	)	

**JOINT MOTION TO EXTEND EXPERT DEADLINES**

**COME NOW** the Parties, by and through their attorneys of record, and for its Joint Motion to Extend Expert Deadlines, do hereby state and allege as follows:

1. This Court entered a Scheduling Order on February 17, 2023, setting deadlines for all matters in the instant case. That discovery is still pending in this matter.
2. The parties are in the process of exchanging written discovery, but have yet to secure an inspection of the subject property and secure necessary depositions to comply with the expert testimony deadlines.
3. The parties are working diligently in accordance with the established deadlines and only request an extension to the expert testimony deadlines.
4. The parties are not making any requests to extend any other deadlines currently.
5. This request is made in good faith and not for the purposes of delay or harassment.

**WHEREFORE**, premises considered, the parties requests the expert deadlines set forth in the Scheduling Order be extended sixty (60) days or such other dates set forth to provide time for discovery to be completed and other relevant pleadings to be timely filed.

Respectfully submitted,

**ATKINSON, BRITTINGHAM,  
GLADD, FIASCO & EDMONDS**  
A PROFESSIONAL CORPORATION

/s/ J. Andrew Brown

J. Andrew Brown, OBA #22504  
1500 ParkCentre  
525 South Main Street  
Tulsa, OK 74103-4524  
Telephone: (918) 582-8877  
Facsimile: (918) 585-8096  
Email: [dbrown@abg-oklaw.com](mailto:dbrown@abg-oklaw.com)  
*Attorney for Defendant SFF&CC*

/s/ Terry M. McKeever

S. Alex Yaffe  
Terry M. McKeever  
FOSHEE & YAFFE  
P.O. Box 890420  
Oklahoma City, OK 73170  
Email: [say@fylaw.com](mailto:say@fylaw.com)  
Email: [tmm@fylaw.com](mailto:tmm@fylaw.com)  
*Attorneys for the Plaintiffs*

S:\Files\416\416Jt Motion to Extend Expert Deadlines.docx